



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

CMM:LS
F. #2024R00485

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 5, 2025

By ECF and E-mail

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Re: United States v. Jacob Israel Walden
Criminal Docket No. 24-521 (GRB)

Counsel:

On March 12, 2025, you requested a copy of the defendant's Apple iPhone, excepting any child sexual abuse material ("CSAM"). On March 24, 2025, the government advised in writing that it was prepared to produce the extraction of the iPhone without any multimedia files. As stated at the status conference of April 8, 2025 (the "Status Conference"), upon further consultation with forensic technicians at the U.S. Department of Homeland Security, Homeland Security Investigations ("HSI"), the government determined that there is no reliable manner by which to assure that all multimedia files are removed from the extraction of the defendant's high-capacity late-model iPhone. Accordingly, to avoid producing CSAM inadvertently, the government declines the request for a copy of the defendant's iPhone. See 18 U.S.C. § 3509(m) (Prohibition on Reproduction of Child Pornography).

The complete unredacted extraction of the subject iPhone, as well as other categories of discovery containing CSAM, remain available for the defense to review at the Newark office of HSI (“HSI-Newark”). Counsel may arrange sessions to review the physical evidence by contacting me or Special Agent Christopher Moriarty.

Enclosed please find additional disclosure that is provided to facilitate the review of the government’s Rule 16 discovery by the defense; the enclosure is not being filed electronically. The enclosed summary is the result of the government’s good faith effort to identify categories of documents contained within the government’s Rule 16 discovery that concern the thirteen (13) identified victims proffered in past court proceedings. Specifically, these are females whom the defendant contacted directly to entice to transmit previously created CSAM, to produce new CSAM, and/or to recruit others for the same purpose. The investigation is ongoing, and the government reserves the right to amend and supplement the enclosed information, including through identification of additional minor victims.

Please note that, because the enclosure contains information concerning minor victims, the enclosed material is considered Attorneys’ Eyes Only Material as that term is defined in the January 24, 2025 Protective Order in this matter. See ECF No. 40. Accordingly, the document has been watermarked “Attorneys’ Eyes Only” on each page.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

JOHN J. DURHAM
United States Attorney

By: /s/ Leonid Sandlar
Leonid Sandlar
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Enclosure

cc: Clerk of the Court (GRB) (by ECF) (without enclosures)